2.0 FACILITY DESCRIPTION AND HISTORY

2.1 CURRENT FACILITY DESCRIPTION

1. The former ILM facility site comprises approximately 67.4 acres and is located on the southeast corner of 190th Street and Western Avenue in the City of Los Angeles, California. Although the legal address of the site is Los Angeles, the former mailing address of the ILM site was the City of Torrance and is referenced as such in this report. The site location is shown in Figure 1.1.

2. The site is currently partially developed with three large warehouse/distribution buildings. The site layout is shown in the Site Plot Plan in Figure 2.1. An aerial photograph of the site and adjacent facilities is shown in Figure 2.2. The square footage of each building is: 684,900 square feet (ft^2) (easternmost building), 305,400 ft^2 (southwestern building) and 259,500 ft^2 (northwestern building), *Current Conditions Report* dated April 21, 1999 by ARCADIS Geraghty & Miller, Inc., formerly Geraghty & Miller, Inc. (ARCADIS G&M, 1999a). There is an undeveloped and unpaved portion of the site along 190th Street and Western Avenue, immediately north of the buildings. The undeveloped portion of the site is scheduled for development in 1999/2000. The final development will include additional warehouse/distribution buildings.

3. The developed portion of the site is covered with buildings, concrete and asphalt paving and with landscaping/planters along Western Avenue and along the southern and eastern boundaries. Current activities onsite are limited to warehousing and distribution; hazardous materials are not used and hazardous wastes are not generated at the site (ARCADIS G&M, 1999a).

2.2 HISTORICAL FACILITY OPERATIONS

1. The site was previously an industrial metal processing facility (former ILM facility). During the busiest period, approximately two-thirds of the site was occupied by buildings housing metal processing equipment and related operations and offices. These former operations at the site are believed to have been the source of contamination to the soil and ground water at the property.

2. Operations at the former ILM facility began around the beginning of World War II and continued under various ownerships until 1992. Normal operations at the former ILM

facility consisted of the manufacturing of extruded and forged aluminum and titanium products, which included a foundry that received aluminum to be melted and alloyed for the extrusion and forge presses.

3. After the aluminum was extruded or forge pressed, it was heat treated, aged and etched to remove lubricants. Upon completion of coating, the extrusions and forgings were cleaned and packaged for shipment.

4. Site operations also included processing titanium. Raw titanium (sponge), often mixed with scrap and/or chip, was heated and compressed into pie-shaped pieces. The pie-shaped sections were then assembled by plasma welding to form logs. The logs were then placed into a vacuum-melt furnace and arc-melted into ingots which were ground, turned and hammered into billets. The billets were then processed for the extrusion press, the bar mill or for sale as billets to titanium manufacturers.

5. As a part of ongoing operations, hazardous materials and wastes were stored and/or treated at the facility. The materials handled included hydrocarbon fuels, chlorinated solvents, acids, caustics and other hydrocarbon compounds. Waste streams generated at the facility included wastewater from plating, cleaning and quenching operations; spent solvents from degreasing systems; spent acids and caustics, sludge, still bottoms, metal chips and dust, waste hydraulic and cooling oils and greases; oil/water mixtures and other solid wastes.

6. The site underwent demolition and concrete removal from 1995 to 1996, as specified in the *Soil RCRA Facility Investigation Report*, Martin Marietta Technologies, Inc. International Light Metals Facility, Torrance, CA, Geraghty & Miller Inc., February 26, 1996 (Geraghty & Miller, 1996a). The site remained undeveloped until 1997, when Fremont Associates, Inc. (Fremont) purchased the property and constructed the three existing warehousing/distribution buildings on approximately 55 acres of the site. The remaining area (approximately 12.4 acres in the northern portion of the property along 190th Street) is currently under development (see Figures 2.1 and 2.2).

2.3 REGULATORY HISTORY/CHRONOLOGY OF CRITICAL EVENTS

1. Critical events regarding environmental issues at the site are primarily related to regulatory milestones. Subsurface investigations began at the site in 1954 and geological and

environmental investigations began in 1983 and 1984. The ILM facility was shut down in 1992 and has been undergoing the RCRA Corrective Action process since 1993.

2. A detailed description of the previous investigations conducted at this site is provided in the Current Conditions Report (ARCADIS G&M 1999a). The regulatory history is briefly summarized in the following sections.

2.3.1 ENVIRONMENTAL ACTIVITIES PRIOR TO FACILITY SHUTDOWN

1. The regulatory history prior to facility shutdown in 1992 is presented as a summary of interaction with regulatory agencies below:

   - EPA: The former facility filed Part A of its RCRA Permit application on June 15, 1987 (ARCADIS G&M, 1999a). On November 17, 1988, EPA sent Martin Marietta a letter acknowledging receipt of the application, and clarifying the facility's RCRA status as a hazardous waste generator and storage facility.
   - Regional Water Quality Control Board (RWQCB): The former facility had an NPDES permit issued by RWQCB in 1989 for rainwater run-off only. RWQCB and California DTSC conducted an inspection in 1986 and concluded that the facility was not subject to RCRA ground water requirements.
   - Department of Toxic Substances Control (DTSC): The former facility had operated with a Hazardous Waste Facility Permit issued by DTSC for hazardous waste storage in accordance with the California Code of Regulations Title 22, Section 66270.1. The EPA identification number of the former facility was CAD 030398622. The facility also had two Extremely Hazardous Waste Disposal Permits issued by DTSC. Permit number 4-92022804 was issued for disposal of PCBs and permit number 4-92060203 was issued for disposal of hydrofluoric and sulfuric/nitric acid mixtures.
   - Los Angeles Fire Department: The Los Angeles Fire Department (LAFD) was involved in the permitting and oversight of several underground fuel and petroleum storage tanks (USTs). The LAFD had also overseen the installation of leak detection and monitoring equipment of the former facility's USTs.
   - South Coast Air Quality Management District (SCAQMD): The former facility held 128 air permits with the SCAQMD.
   - Los Angeles County Sanitation District: The former facility held industrial wastewater discharge permit number 700 R-1 issued by the Los Angeles County Sanitation District.

2.3.2 ENVIRONMENTAL ACTIVITIES FOLLOWING FACILITY SHUTDOWN

1. The regulatory history following facility shutdown in 1992 is presented as a chronology of critical events below:

- 1992:
  - The facility ceased operations in August.
  - In October and November, asbestos-containing materials were tested and removed in preparation of plant demolition activities.
  - A Site Historical Review was prepared for the entire facility which identified and described every feature in use at the facility.
  - A RCRA-permitted hazardous waste management facility closure plan was submitted to DTSC in May.
  - Meetings were held with DTSC to discuss site-wide closure strategy under a RCRA Corrective Action Program (CAP) process in September. A fee-for-service program was initiated with DTSC for site-wide closure.
  - Meetings were held with the LAFD and DTSC regarding closure of the 27 USTs at the site in September. It was agreed that DTSC would be lead agency for all site activities including all UST removal actions. All USTs would be removed in accordance with LAFD guidelines and under LAFD supervision; however, any characterization and/or remediation of impacted soil would be addressed under the RCRA CAP.
  - DTSC performed an inspection of the facility in September.
  - Martin Marietta submitted a revised RCRA-Permitted Units Closure Plan to DTSC in December.
- 1993:
  - No significant activities other than ongoing reviews.
- 1994:
  - A Visual Site Inspection (VSI) conducted by DTSC and Martin Marietta in January.
  - The Quick-Look Sampling Visit (QLSV) was initiated in January.
  - The VSI data was used by DTSC to complete the RCRA Facility Assessment (RFA) in May.
  - A Fact Sheet on the RCRA Closure Plan distributed to mailing list in May.
  - RCRA-permitted unit Closure Plan review, Public Comment Period and Public Hearings. Approval by DTSC occurred in June.
  - Phase I of RCRA-permitted unit closure activities were initiated in July.
  - RFI conceptual scoping meetings were held with DTSC in July.
  - Installation of 5 ground water monitoring wells as part of Soil RFI activities was completed in August.
  - RFI Workplan was submitted to DTSC in August.
  - Soil RFI activities were initiated in September.
  - Baseline Risk Assessment (BRA) Workplan for soils was submitted to DTSC in October.

- BRA Workplan for soils was approved by DTSC in November.
- Phase II of RCRA-permitted unit closure activities were initiated in December.
- DTSC conducted an Initial Study and Checklist as part of the California Environmental Quality Act (CEQA) document preparation. Based on the findings of the Initial Study and Checklist, a Negative Declaration was prepared by DTSC.

• 1995:
  - Martin Marietta submitted a Public Participation Plan to DTSC in January.
  - Closure Certification Report for Phase I activities of RCRA-permitted units were submitted to DTSC in January.
  - Interim Measures Workplan was submitted to DTSC in February.
  - Installation of 5 additional ground water monitoring wells was completed in March.
  - A Fact Sheet on proposed Interim Measures was distributed to mailing list in March.
  - Corrective Action Administrative Agreement on Consent executed for RCRA CAP in March.
  - Soil RFI field activities were completed in April.
  - Individual vapor extraction workplans were submitted to DTSC in April.
  - DTSC/Lockheed Martin held public workshops on Interim Measures technologies in April.
  - DTSC granted approval for Interim Measures Workplan, Vapor Extraction Workplans and the CEQA document in April.
  - Vapor extraction wells were installed, and the five vapor extraction systems were started in June.
  - All 27 USTs were removed from the site by August. As per the agreement with DTSC and LAFD, USTs were removed under the supervision of the LAFD, but impacted soil was addressed under RCRA CAP.
  - Supplemental RFI activities were conducted in November and December, subsequent to building demolition activities.
  - Sixteen additional ground water monitoring wells were installed and quarterly ground water monitoring (for 1 year) was initiated at the site. This was implemented in December.

• 1996:
  - The Ground Water RFI Workplan was submitted to DTSC and approved in January.
  - All vapor extraction activities were completed in January.
  - The workplan for soil excavation under Interim Measures was submitted to DTSC and approved in February.
  - The Soil RFI report was submitted to DTSC in February.
  - A second round of ground water sampling was conducted in February.
  - Environmental monitoring of concrete and soil during concrete demolition and grading activities was initiated in February.

- Soil excavation as part of Interim Measures was initiated in February.
- The soil BRA report was submitted to DTSC in March.
- The Soil RFI report was approved by DTSC in April.
- Soil excavation activities completed at interim measures sites in May.
- The Draft Ground Water Data Assessment Report (DAR) submitted to DTSC in May.
- The RCRA-permitted unit closure report submitted to DTSC in May.
- A third round of ground water sampling was conducted in June.
- The Interim Measures Completion Report was submitted to DTSC in July.
- A fourth round of ground water sampling was conducted in September.
- DTSC granted approval of the soil BRA and Interim Measures Completion Report in September.
- Concrete demolition and grading activities were completed in September.
- A California Environmental Quality Act (CEQA) Notice of Exemption was filed by DTSC with the State Office of Planning in December.

• 1997:
  - The Public Participation Plan (PPP) was revised and submitted to DTSC in January.
  - A Fact Sheet on the DTSC approval process for Interim Measures was distributed to mailing list in March.
  - The Completion Report for Site Demolition Activities was submitted to DTSC in May.
  - An application for Designation of Administering Agency was submitted to California EPA in July.
  - A round of ground water sampling was conducted in July.
  - A No Further Action for Soil Remedy Approval granted by DTSC in August.
  - The former ILM facility was sold to Sunshine/Fremont in September.
  - Ten wells were abandoned in order to facilitate building construction for the new property owner.
  - The Site Designation Committee approved DTSC as lead regulatory agency for the former ILM site in October.

• 1998:
  - The Offsite Ground Water Investigation Workplan was prepared by Boeing Realty Corporation (BRC) and submitted to DTSC in December.
  - The Corrective Action Consent Agreement was executed for the RCRA CAP for ground water in December.

• 1999:
  - The Offsite Ground Water Investigation was initiated in February.
  - A letter documenting the Ground Water Sampling Workplan submitted to DTSC in March.
  - Updated version of the site-specific Project Management Plan, Health and Safety Plan and updated pages of the Quality Assurance Project Plan submitted to DTSC in March.

- A letter documenting PPP requirements submitted to DTSC in March.
- One round of ground water sampling of remaining onsite wells and eight offsite BRC wells was conducted in March.
- The Current Conditions Report (ARCADIS G&M, 1999a) was prepared be ARCADIS G&M and submitted to DTSC in April.
- One round of ground water sampling of remaining onsite wells and eight offsite BRC wells was conducted in July.
- The Exposure Pathway Assessment and Human Health Risk Assessment Workplan was prepared by ARCADIS G&M and submitted to the DTSC in August.